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**PROPOSED ATTORNEYS FOR DEBTOR SUPERIOR AIR PARTS, INC.**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**IN RE:**

**SUPERIOR AIR PARTS, INC.,**

**Debtor.**

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**Case No. 08-36705**

**Chapter 11**

**DEBTOR'S MOTION FOR EXPEDITED HEARING ON MOTIONS  
FILED BY THE DEBTOR ON JANUARY 2, 2008**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Superior Air Parts, Inc. ("Superior" or "Debtor"), as debtor and debtor-in-possession, seeks an Expedited Hearing on its Motions filed on January 2, 2008, as follows:

1. On December 31, 2008, Superior Air Parts, Inc. filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtor continues to operate its business and manage its properties and assets as a debtor-in-possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code. No committee, Chapter 11 trustee or examiner has been appointed in this case; however, Debtor has filed and provided to

the U.S. Trustee the list of twenty largest creditors with facsimile numbers and has served such creditors with the motions by facsimile.

2. On January 2, 2008, Debtor filed several motions that require an interim or final hearing before the expiration of the negative notice language deadlines. A list of the motions for which Debtor seeks expedited consideration are as follows:

Docket No.	Title of Motion	Date Filed
7	Debtor's Motion For Order Authorizing The Debtor To Pay Pre-Petition Wages, Salaries And Employee Benefits	January 2, 2008
6	Debtor's Motion Pursuant to Section 364(c) of the Bankruptcy Code for Final Order Authorizing Post-petition Financing	January 2, 2008
8	Debtor's Motion for Authority to Implement Retention Program for Key Employees	January 2, 2008
10	Debtor's Motion for Approval of Bid Procedures	January 2, 2008
12	Debtor's Motion for Order Setting Bar Date for Claims	January 2, 2008

3. Superior sells parts for small airplanes and has entered into an agreement to sell its assets to Avco Corporation after the Debtor goes through a bid procedure. The company has essentially stopped selling parts or assembling engines and will survive from the collection of accounts receivable until the sale closes. So time is of the essence.

4. Expedited consideration is warranted because Debtor need to give notice of certain proposed transactions to over 200,000 piston engine aircraft owners and by publication in trade magazines. Due to deadlines for submission to the trade magazines, this notice needs to go out in early January in order for us to conduct an

auction and conclude the sale in February. Further delay could substantially reduce distributions to unsecured creditors. All of the Motions for which expedited consideration is requested (i) relate to approval of the proposed sale process, (ii) seek deadlines or administrative rulings to allow for the sale process to continue or (iii) are designed to retain and pay certain key employees to permit the process to continue.

5. Debtor requests that the hearings be set on Friday, January 9, 2009, or such time thereafter as the Court's schedule will permit.

WHEREFORE, the Debtor request that the Court enter an Order expediting a hearing on the motions listed herein and granting such other and further relief as this Court may deem just and proper.

Respectfully submitted,

/s/ Stephen A. Roberts

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**Proposed Bankruptcy Attorneys for the Debtor**

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that this motion is unopposed by the following parties: Thielert AG (the sole shareholder and secured creditor of the debtor). Since this motion is filed within one business day of the petition date, the undersigned will not know whether any parties may object until they are served.

/s/ Duane J. Brescia  
Duane J. Brescia

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was served upon the Comprehensive Service List via First Class U.S. Mail, postage prepaid and email on January 2, 2009.

/s/ Duane J. Brescia  
Duane J. Brescia